US EPA RECORDS CENTER REGION 5
487373

Work Plan

For

Expert Toxicologist and Case Assistance for EPA Region V

Revised.

March 22, 1982

This document has been prepared pursuant to EPA Contract TMS III Task No. 24-1 for the U. S. Environmental Protection Agency Municipal Enviornmental Research Laboratory, Cincinnati, Ohio

Submitted by:

JRB Associates 8400 Westpark Drive McLean, VA 22102

EPA Contract No. 68-03-3113, Task 42-6 JRB Project No. 2-817-03-956-47

March 19, 1982

Mr. James M. Bzdusek
Contracting Officer
Contract Management Division
Negotiated Contracts Branch
U.S. Environmental Protection Agency
26 W. St. Clair
Cincinnati, OH 45268

Reference: EPA Contract No. 68-03-3113, Task 42-6

JRB Project No. 2-817-03-956-47

Subject: Work Plan Submittal

Dear Mr. Bzdusek:

JRB is resubmitting the work plan for providing expert toxicology assistance to EPA Region V. The original work plan, submitted on February 19, 1982, contained work elements that are no longer needed by Region V. The enclosed revised work plan includes increased technical hours for the expert toxicologist, Dr. C. D. Klaassen, and a reduced number of hours for JRB over the original submittal. Dr. Klaassen can provide up to thirty hours a month for the duration of this task.

It should be noted that the total estimated cost for this work assignment does not include any of the award fee pool, which on this work assignment could be \$1,209 (6% of \$20,142). This is in addition to the total estimated cost in the work plan.

Please let me know of your questions or comments.

Sincerely,

Robert A. Colonna Vice President

Enclosures

cc: Mr. Michael Mutnan, EPA Region V
Mr. Frank Freestone, EPA Project Officer

1.0 INTRODUCTION

At the request of EPA Region V, JRB will provide an expert toxicologist to assist in case development and technical support during legal proceedings for the BASF/FMT facility in Riverview, Michigan. Even though JRB will not contribute to the day-to-day efforts of performing this task, we will remain involved in overseeing the progress of the expert toxicologist, insuring that he is meeting the needs of Region V, and reporting progress on the task to internal and EPA project management personnel. The following shows how this effort will be conducted.

Task 1. Selection of Expert Toxicologist and Work Plan Preparation

A number of activities preceded the selection of the expert toxicologist, Dr. C.D. Klaassen, for Region V assistance. They are as follows:

- Reviewed qualifications of staff toxicologists and support personnel
- Reviewed qualifications of experts recommended by staff,
 EPA and other sources
- Submitted qualifications to EPA Region V following an initial screening by JRB
- Discussed qualifications of candidates with Region V
- Following selection of the expert by Region V, discussed scope of task with expert and obtained verbal agreement to participate
- Will obtain signed consulting agreement from expert contingent upon work plan approval.

All but the last activity were performed as part of a management function for the overall JRB MERL contract and, as such, were not billed to this task.

Following EPA approval of the expert toxicologist this work plan was prepared based on a scope of work prepared by EPA, background information on the case assembled by EPA and conversations with the EPA technical manager on this case, Mr. Michael Mutnan, and the EPA attorney, Mr. Gerald Frumm.

Following work plan approval, case assistance will be provided as described in the following task.

Task 2. Case Assistance

The expert toxicologist will meet with EPA Region V in Chicago to discuss strategy for the case. If the toxic properties of the materials at the site do not warrant further development of the case, then emphasis will be placed on negotiations with the company to obtain a more complete site closure. If further development of the case is warranted, then various activities described in the following will be conducted depending on case needs.

- Define hazards of compounds identified or suspected to be present at the site
- Review and interpret defendant's toxicological data and any defendent expert toxicological witnesses
- Assist in preparing for defendant depositions and trial examination of defendant's witnesses for toxicological issues
- Prepare a written toxicological assessment for use in a settlement document
- Perform site inspections, attend meetings and perform other similar activities related to the legal case.

Depending on how the case progresses, it appears that some combination of the above activities will be needed. Assistance will be provided by the expert toxicologist as the need arises until Task resources are expended.

Analysis of remedial alternatives for the site, originally part of the work assignment for this task, will be conducted by EPA Region V. A review of production processes used by this facility, generated wastes and related hazards was originally part of the work assignment for this task. EPA Region V no longer needs this review as part of its case development activities for the BASF/FMT facility.

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This form is for use when (i) submission of cost or pricing data (see	FPR 1-3.807-3) the contracting	is required an officer.	PAGE NO		OF PAGES
NAME OF OFFEROR	SUPPLIES AND/	OR SERVICES TO	BE FURNISHED		
JRB Associates HOME OFFICE ADDRESS	Expert Toxicologist and Case Assistance				
8400 Westpark Drive	for LPA	Region	V		
McLean, Virginia 22102		•			
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Project Administrator	16	10.08	161		
Clerical	24	7.12	171		

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	EXHIBIT A—SUPPORTING SCHEDULE (Specify. If more space is needed,	use reverse)	and the second
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	3 Meetings in Chicago @ \$296/RT Airfare		20
	1 Meeting in Detroit @ \$374/RT Airfare		<u>888</u> 374
	Hotel: 4 Nights @ \$50/Night		200
	Car Rental: 4 Days @ \$40/Day	-	160
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VES [X NO (If yes, identify.):		•
V. DOES THIS CO	ST SUMMARY CONFORM WITH THE COST PRINCIPLES SET FORTH IN AGENCY REGULATIONS?		
X YES	NO (If no, explain on reverse or separate page)		

See Reverse for Instructions and Footnotes

OPTIONAL FORM 60 (10-71)